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Honorable Christopher Alston
Chapter 7
Hearing Date: 4/24/2020 at 9:30 am
Response Date: 4/17/20
Location Seattle Rm 7206

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

IN RE:)	
)	Case No. 19-10862
Linda Lee Parker,)	REPLY TO OBJECTION
)	MOTION
)	FOR AN ORDER TO
)	COMPEL ABANDONMENT
Debtor.)	
)	

REPLY

COMES NOW THE DEBTOR, by and through her attorney, Erin Lane, and replies to the Trustee's objection as follows:

The Trustee asserts that the Debtor still listed the property for sale after rejecting an offer from the Trustee to sell her house. This is no true.

As soon as the Trustee notified counsel in December 2019 that the house was on the market for sale the Debtor was notified. The Debtor took the necessary steps to remove the house from the market. The Debtor was confused on receiving from the bankruptcy court the bankruptcy court that the Chapter 13 she converted from was finalized. This was relayed to the Trustee.

The Debtor also plans on using the proceeds of the sale of the house to acquire another dwelling for herself. The Debtor's son, David Parker, has stepped in to make sure that the Debtor is not confused throughout this process. He has assured counsel the steps were taken

1 to remove the house and that the proceeds will be used to acquire a dwelling for the debtor.
2 The Debtor is still entitled to her homestead exemption. (see enclosed declaration of David
3 Parker).
4

5 After discussing the debtor's rejection of the Trustee's offer the Trustee suggested, more
6 than once, a motion to abandon be filed. After nothing had happened for months on the case
7 the Debtor, through counsel, filed the motion to abandon. The sale of the house would not
8 create a meaningful distribution to creditors.

9 WHEREFORE, Debtor requests the entry of an order of abandonment of the Property from the
10 bankruptcy estate pursuant to 11 U.S.C. §554(b) and for such other and further relief as is just.

11 /s/Erin Lane
12 Erin Lane, WSBA #42504
13 Attorney for Debtor
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